

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GAETANO DEVELOPMENT CORP, GATEWAY
IV, LLC and HARTFORD FIRE INSURANCE
COMPANY a/s/o GATEWAY IV, LLC,

Plaintiffs,

- against -

GOODMAN MANUFACTURING COMPANY, LP,
GOODMAN COMPANY, LP and GOODMAN
GLOBAL, INC,

Defendants.

GOODMAN COMPANY, LP,

Third-Party Plaintiff,

- against -

TOWER MANUFACTURING CORPORATION,

Third-Party Defendant.

TOWER MANUFACTURING CORPORATION,

Second Third-Party Plaintiff,

- against -

EVEREX COMMUNICATIONS, INC, PRIME
TECHNOLOGY (GUANGZHOU), INC,
CONNECTICUT PTAC SERVICES, LLC, and
COOL TECH HVAC SERVICE, LLC,

Second Third-Party Defendants.

Judge Rakoff

Case No.: 09-cv-10090
(consolidated)

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10/16/10
11:25
S.D. COURT
U.S. DISTRICT COURT
S.D. OF N.Y.

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kenneth L. Moskowitz, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of

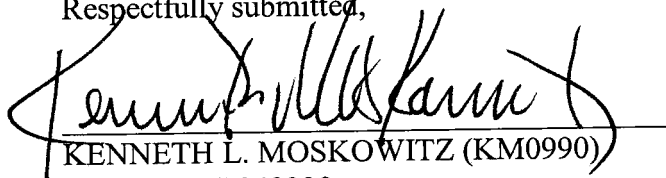
Applicant's Name: Michael J. Dougherty
Firm Name: Weltman, Weinberg & Reis Co., L.P.A.
Address: 325 Chestnut Street, Suite 501
City/State/Zip: Philadelphia, Pennsylvania 19106
Phone Number: 215-599-1500 x 81501
Fax Number: 215-599-1505
Email Address: mdougherty@weltman.com

Michael J. Dougherty is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the Bar of the United States District Court for the Eastern District of Pennsylvania. There are no pending disciplinary proceedings against Michael J. Dougherty in any State or Federal court.

Counsel for the other parties in this action have consented to Mr. Dougherty's pro hac vice admission.

Dated: August 13, 2010
Millburn, New Jersey

Respectfully submitted,


KENNETH L. MOSKOWITZ (KM0990)
SDNY Bar # 049330
Brown Moskowitz & Kallen, P.C.

711 Third Avenue, Suite 1803
New York, New York 10017

75 Main Street, Suite 203
Millburn, New Jersey 07041
P: (973) 376-0909
F: (973) 376-0903

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Defendants.

Judge Rakoff

Case No.: 09-cv-10090
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GOODMAN COMPANY, LP,

Third-Party Plaintiff,

- against -

TOWER MANUFACTURING CORPORATION,

Third-Party Defendant.

**AFFIDAVIT OF KENNETH L.
MOSKOWITZ IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

TOWER MANUFACTURING CORPORATION,

Second Third-Party Plaintiff,

- against -

EVEREX COMMUNICATIONS, INC, PRIME
TECHNOLOGY (GUANGZHOU), INC,
CONNECTICUT PTAC SERVICES, LLC, and
COOL TECH HVAC SERVICE, LLC,

Second Third-Party Defendants.

State of New Jersey)
)
County of Essex) ss:

Kenneth L. Moskowitz, being duly sworn, hereby deposes and says as follows:

1. I am a member of the law firm Brown Moskowitz & Kallen, P.C., counsel for Second Third-Party Defendant, Prime Technology (Guangzhou), Inc. ("Prime"), in the above-captioned action. I am familiar with the proceedings in this matter. I have personal knowledge of the facts set forth herein, and I make this affidavit in support of Prime's motion to admit Michael J. Dougherty as counsel pro hac vice to represent it in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in February 1986. I am also admitted to the Bar of the United States District Courts for both the Southern District and Eastern District of New York, and am in good standing with those Courts.

3. I have known Michael J. Dougherty since 2009.

4. Mr. Dougherty is a Partner at Weltman, Weinberg & Reis Co., L.P.A., in Philadelphia, Pennsylvania.

5. Michael J. Dougherty is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the Bar of the United States District Court for the Eastern District of Pennsylvania. There are no pending disciplinary proceedings against Michael J. Dougherty in any State or Federal court. Copies of his Certificates of Good Standing are attached hereto as Exhibit A.

6. I have found Mr. Dougherty to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

7. Accordingly, I am pleased to move the admission of Michael J. Dougherty, pro hac vice.

8. Counsel for the other parties in this action have consented to Mr. Dougherty's pro hac vice admission.

9. I respectfully submit a proposed order granting the admission of Michael J. Dougherty, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Michael J. Dougherty, pro hac vice, to represent Prime in the above captioned matter, be granted.

Dated: August 13, 2010
Millburn, New Jersey

Respectfully submitted,



KENNETH L. MOSKOWITZ (KM0990)

SDNY Bar # 049330

Brown Moskowitz & Kallen, P.C.

711 Third Avenue, Suite 1803
New York, New York 10017

75 Main Street, Suite 203
Millburn, New Jersey 07041
P: (973) 376-0909
F: (973) 376-0903

Subscribed and sworn to before me
this 13th day of August, 2010.


Notary Public

Samantha K. Large
NOTARY PUBLIC
State Of New Jersey
My Commission Expires 10/17/2013

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SOUTHERN DISTRICT OF NEW YORK**

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Plaintiffs,

- against -

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GOODMAN COMPANY, LP and GOODMAN
GLOBAL, INC,

Defendants.

Judge Rakoff

Case No.: 09-cv-10090
(consolidated)

GOODMAN COMPANY, LP,

Third-Party Plaintiff,

- against -

TOWER MANUFACTURING CORPORATION,

Third-Party Defendant.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

TOWER MANUFACTURING CORPORATION,

Second Third-Party Plaintiff,

- against -

EVEREX COMMUNICATIONS, INC, PRIME
TECHNOLOGY (GUANGZHOU), INC,
CONNECTICUT PTAC SERVICES, LLC, and
COOL TECH HVAC SERVICE, LLC,

Second Third-Party Defendants.

Upon the motion of Kenneth L. Moskowitz, attorney for Second Third-Party Defendant, Prime Technology (Guangzhou), Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Michael J. Dougherty
Firm Name:	Weltman, Weinberg & Reis Co., L.P.A.
Address:	325 Chestnut Street, Suite 501
City/State/Zip:	Philadelphia, Pennsylvania 19106
Phone Number:	215-599-1500 x 81501
Fax Number:	215-599-1505
Email Address:	<u>mdougherty@weltman.com</u>

is admitted to practice pro hac vice as counsel for Second Third-Party Defendant, Prime Technology (Guangzhou), Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

Hon. Jed S. Rakoff, United States District Judge



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Michael J. Dougherty, Esq.

DATE OF ADMISSION

November 21, 1995

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: August 3, 2010**

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA }

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Michael J. Dougherty , Bar # 76046, was duly admitted to practice in said Court on March 4, 1996, and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on August 3, 2010.

BY

Aida Ayala
Aida Ayala, Deputy Clerk

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Judge Rakoff

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(consolidated)

GOODMAN COMPANY, LP,

Third-Party Plaintiff,

- against -

TOWER MANUFACTURING CORPORATION,

Third-Party Defendant.

CERTIFICATE OF SERVICE

TOWER MANUFACTURING CORPORATION,

Second Third-Party Plaintiff,

- against -

EVEREX COMMUNICATIONS, INC, PRIME
TECHNOLOGY (GUANGZHOU), INC,
CONNECTICUT PTAC SERVICES, LLC, and
COOL TECH HVAC SERVICE, LLC,

Second Third-Party Defendants.

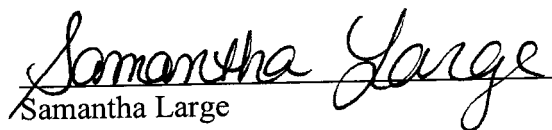
I, Samantha Large, of full age, hereby certify as follows:

1. I am not a party to this action, and am employed at the law firm of Brown Moskowitz & Kallen, P.C., 75 Main Street, Suite 203, Millburn, New Jersey, attorneys for Second Third-Party Defendant Prime Technology (Guangzhou), Inc. ("Prime").

2. On August 13, 2010, I caused to be transmitted for filing to the Clerk of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, via United Parcel Service, a Motion to Admit Counsel Pro Hac Vice, Affidavit of Kenneth L. Moskowitz, Proposed Form of Order, Certificates of Good Standing, and this Certificate of Service.

3. In addition, on August 13, 2010, I also caused to be transmitted, via email, each of the aforesaid documents to each of the attorneys on the attached service list

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Samantha Large

Dated: August 13, 2010

SERVICE LIST

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